

Case 1:23-cr-00611-JGK Document 17 Filed 02/26/24 Page 1 of 1 BRADLEY LAW FIRM

A PROFESSIONAL CORPORATION

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February 26, 2023

By ECF

Honorable John G. Koeltl

United States District Judge Southern District of New York

500 Pearl Street

New York, New York 10007

Application denied. The defendant has been detained based on danger to the tommunity. Release at this time would continue to present

Re:

United States v. Christopher Scott

23 Cr. 611 (JGK)

Dear Judge Koeltl:

I represent Christopher Scott in the above-referenced matter. He is currently detained at Metropolitan Detention Center - Brooklyn (MDC). I write to respectfully request that Mr. Scott's bail conditions be temporarily modified to permit him to attend his grandmother's funeral in the Bronx on March 1, 2024, at 9:00 a.m. and be returned to detention immediately thereafter. The government opposes this request.

Mr. Scott's grandmother passed away on February 14, 2024. She primarily raised him from when he was a small child. She lived in the household and took care of him so that his mother could work and attend school. As he got older, she remained a patient and nurturing presence in his life. He was her only grandchild. And most recently, Mr. Scott was doing his best to repay her sacrifice by serving as her primary caretaker, accompanying her to medical appointments and ensuring that she had sufficient food and necessary medications. Defense counsel can produce a medical examiner's report to the Court upon request. Accordingly, it is respectfully requested that the Court temporarily modify his bail conditions to permit him to attend his grandmother's funeral service. A proposed order is attached for the Court's convenience.

We appreciate the Court's time and attention to this matter.

Respectfully submitted,

Michael D. Bradley

Attorney for Christopher Scott

AUSA Meredith Foster (via ECF)

cc: